

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT H. TAYLOR JR.,
Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

THE CHEMOURS COMPANY, MARK
NEWMAN, JONATHAN LOCK, CAMELA
WISEL, and SAMEER RALHAN,

Defendants.

Case No. 24-cv-361-RGA

CLASS ACTION

TODD MASEL, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THE CHEMOURS COMPANY, MARK E.
NEWMAN, SAMEER RALHAN, and
JONATHAN LOCK,

Defendants.

Case No. 24-cv-377-RGA

CLASS ACTION

**NOTICE OF NON-OPPOSITION TO THE MOTION OF CINDY NGUYEN FOR: (1)
CONSOLIDATION OF RELATED ACTIONS; (2) APPOINTMENT AS LEAD
PLAINTIFF; AND (3) APPROVAL OF SELECTION OF COUNSEL**

FARNAN LLP

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*[Proposed] Lead Counsel for
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Plaintiff Cindy Nguyen (“Movant”), respectfully submits this Notice of Non-Opposition to her motion for an order consolidating the related actions, appointing Movant as Lead Plaintiff, and approving Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel and Farnan LLP as Liaison Counsel for the litigation, filed on May 20, 2024. D.I. 6.

The deadline for any party to oppose Movant’s motion was June 3, 2024. *See* D. Del. LR 7.1.2.(b). No opposition has been filed. Movant’s motion is unopposed.¹ Movant’s motion should be granted forthwith, so that Movant can confer with defense counsel and propose a schedule for the filing of a consolidated amended complaint and defendants’ anticipated motion to dismiss. *See* D.I. 5.

Dated: June 4, 2024

Respectfully submitted,

FARNAN LLP

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¹ The [Proposed] Order granting Movant’s motion was filed as D.I. 6-2.

*[Proposed] Lead Counsel for
Plaintiff and the Class*